

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

The Coleman Company, Inc.,	)	
	)	
<i>Plaintiff/Counterclaim Defendant,</i>	)	
	)	
v.	)	Civil Action No: 2:20cv351-RGD-RJK
	)	
Team Worldwide Corporation,	)	
	)	
<i>Defendant/Counterclaim Plaintiff</i>	)	
	)	
and	)	
	)	
Cheng-Chung Wang	)	
	)	
<i>Counterclaim Plaintiff</i>	)	
_____	)	

**TEAM WORLDWIDE CORPORATION AND CHENG-CHUNG WANG’S NOTICE OF  
MOTION TO SEAL THEIR OPPOSITION TO PLAINTIFF THE COLEMAN  
COMPANY, INC.’S MOTION FOR SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that Defendant/Counterclaim Plaintiff Team Worldwide Corporation and Counterclaim Plaintiff Cheng-Chung Wang (collectively, “TWW”), by counsel, in accordance with Local Rule 5 and the Protective Order entered in this case (ECF No. 55) (“Protective Order”), have moved the Court for leave to file under seal TWW’s unredacted Opposition to Plaintiff The Coleman Company, Inc.’s Motion for Summary Judgment and supporting Exhibit B thereto. The grounds in support of TWW’s Motion to Seal are set forth in TWW’s non-confidential Memorandum in Support of its Motion to Seal.

Before the Court may seal court documents, “it must give public notice of the request to seal and allow interested parties a reasonable opportunity to object.” *Ashcraft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000). In compliance with Local Rule 5 of the Rules of the Eastern District of Virginia and *Ashcraft*, TWW posts the following notice:

Interested parties and non-parties may submit memoranda in support of or in opposition to the motion within seven (7) days after the filing of the motion to seal and designate all or part of such memoranda as confidential. Any information designated as confidential in supporting or opposing memoranda will be treated as sealed pending a determination by the Court on the motion to seal.

This serves as public notice that any person objecting to the motion must file an objection with the Clerk within seven (7) days after the filing of the motion to seal and that if no objection is filed in a timely manner, the Court may treat the motion as uncontested. Objections to the motion should be filed in the Civil Section of the Clerk's Office. The Notice will be posted for a minimum of forty-eight (48) hours.

Dated: November 5, 2021

Respectfully submitted,

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*Attorneys for Team Worldwide Corporation  
and Cheng-Chung Wang*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing on November 5, 2021 with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all registered users.

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